

November 6, 2018

The Honorable John Thune United States Senate Washington, DC

Dear Senator Thune,

Thank you for your time last night. I enjoyed our conversation very much. To recap, here are some of the things we discussed:

As a small broadcaster, the amount of time I spend with FCC paperwork is a growing frustration. It seems that there are more EAS tests and reports than ever before. In addition, moving our public inspection file to the new online portal literally took days, and creates an extra on-going process that we didn't have before. Then there are quarterly issue reports, annual ownership reports, political advertising documentation, and EEO reports, to name a few. I know firsthand that many small broadcasters actually spend thousands of dollars to have FCC attorneys handle these things because they either don't have time to do the paperwork, or are unsure if they are doing it correctly. Plus, in 30 years I've never had anyone ask to see my public file.

One partial solution that I'd like to offer is a carve-out for the smallest broadcasters. I am the owner of one stand-alone FM that only employs ten full-time people. In the past nine years, I have hired a total of four people. Because of the labor shortage the country is experiencing, race, creed, or national origin would have zero effect on who I hire. If they're at all qualified, they're hired! The annual EEO report is not only one of the most time consuming reports I do, but it also requires various other activities that broadcasters must do each year to earn "points" that are necessary to pass muster on the EEO report.

Would it be possible that the smallest employers, like myself, that have 15 to 20 full-time employees or less, no longer be required to file an EEO report? As the owner and manager of a very small business, I wear a number of different hats, and truly find the amount of time I spend on required FCC paperwork to be burdensome. Eliminating at least one of those reports would be a welcomed relief.

Thank you for your consideration. Feel free to contact me at any time for additional information.

Sin¢erely,

Bob Faehn